

SULLIVAN, HILL, LEWIN, REZ & ENGEL
 A Professional Law Corporation
 James P. Hill, CA SBN 90478 (Pro Hac Vice)
 Jonathan S. Dabbieri, CA SBN 91963 (Pro Hac Vice)
 Elizabeth E. Stephens, NV SBN 5788
 228 South Fourth Street, First Floor
 Las Vegas, NV 89101
 Telephone: (702) 382-6440
 Fax Number: (702) 384-9102

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Attorneys for Chapter 7 Trustee,
 William A. Leonard, Jr.

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re)	CASE NO. BK-S-09-32824-RCJ (Lead Case)
)	
ASSET RESOLUTION, LLC,)	Jointly Administered with Case Nos.:
)	BK-S-09-32831-RCJ; BK-S-09-32839-RCJ;
Debtor.)	BK-S-09-32843-RCJ; BK-S-09-32844-RCJ;
)	BK-S-09-32846-RCJ; BK-S-09-32849-RCJ;
)	BK-S-09-32851-RCJ; BK-S-09-32853-RCJ;
)	BK-S-09-32868-RCJ; BK-S-09-32873-RCJ;
Affects:)	BK-S-09-32875-RCJ; BK-S-09-32878-RCJ;
<input checked="" type="checkbox"/> All Debtors)	BK-S-09-32880-RCJ; BK-S-09-32882-RCJ
)	
)	Chapter 7
)	
WILLIAM A. LEONARD, JR., Chapter 7)	ADV. CASE NO. 13-01196-RCJ
Trustee,)	
)	REQUEST FOR ENTRY OF DEFAULT
Plaintiff,)	AGAINST COMPASS USA SPE, LLC
)	
v.)	Ctrm: RCJ - Courtroom 6
)	Bruce R. Thompson Federal Building
COMPASS USA SPE, LLC, a Delaware)	400 S. Virginia Street
Limited Liability Company; PLATINUM)	Reno, NV 89501
FINANCIAL TRUST, LLC; an Indiana)	Judge: Hon. Robert C. Jones
Limited Liability Company)	
)	
)	
Defendants.)	

Pursuant to Rule 7055 of the Federal Rules of Bankruptcy Procedure ("FRBP") and Rule 55 of the Federal Rules of Civil Procedure ("FRCP"), named Plaintiff William A. Leonard, Jr., Chapter 7 Trustee ("Plaintiff"), respectfully requests the Clerk to execute the attached Entry of Default. In support of its request, Plaintiff alleges as follows: 1 -

1. On or about October 23, 2013, Plaintiff filed a Complaint (the “Complaint”) against Defendant Compass USA SPE, LLC (“Defendant”) seeking recovery of all rights, title and interest in and to the certain property situated in the City of Fort Meyers, Lee County, State of Florida described more particularly in Exhibit A to the complaint (“Property”) and turnover of the property with profits or proceeds thereof paid to Defendant. *See* Dkt. No. 1.

2. On or about October 24, 2013, this Court issued summons on Defendant. The summons was served on Defendant by United States Mail on or about October 31, 2013, and the Certificate of Service was filed with the Court on January 29, 2014. *See* Dkt. No. 14.

3. The deadline for defendant to file an answer or otherwise respond to the Complaints was November 25, 2013. *See* FRBP 7012.

4. The Defendant has failed to file an answer or other response to the Complaint or plead or otherwise defend the claims in the Complaint. *See* Docket *en passim*.

5. Pursuant to FRCP 55(a), when a “party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk must enter the party’s default.”

6. A declaration of Jonathan S. Dabbieri in support of this request is filed concurrently herewith.

WHEREFORE, the Plaintiff requests the Clerk of the Court enter Compass’ default.

Dated: January 30, 2014

SULLIVAN, HILL, LEWIN, REZ & ENGEL
A Professional Law Corporation

By: /s/ Jonathan S. Dabbieri
James P. Hill
Jonathan S. Dabbieri
Elizabeth E. Stephens
Attorneys for Chapter 7 Trustee,
William A. Leonard, Jr.